

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	CASE NO. 23-90614
GENESIS CARE PTY LIMITED, <i>et al.</i>	§	Chapter 11 (MI)
	§	
DEBTORS	§	Jointly Administered

**OBJECTION OF GREG DUNNING TO AND NOTICE OF
OPT-OUT OF ALL THIRD-PARTY RELEASES AND EXCULPATIONS
[RELATED TO DKT 828 and 1024]**

Greg Dunning (“Dunning”) through their undersigned counsel, respectfully file this Objection to and Notice of Opt-Out of all Third-Party Releases and Exculpations that may be contained within the Debtor’s First Amended Plan. Dunning objects to and opts out of all third-party releases and exculpations contained within the Plan or any order confirming the Plan and does not consent to the release of any non-debtor party. For the avoidance of doubt, Dunning, as a personal injury tort claimant, does not consent to the claims resolution process as contained in the Amended Plan, or that the Bankruptcy Court has jurisdiction to determine whether such colorable claim exists. 28 U.S.C. § 157(b)(2)(o) explicitly excludes “personal injury tort or wrongful death claims” from “core proceedings.”

Respectfully submitted,

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/s/ Robert Yaquinto, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2023, a true and correct copy of the foregoing Motion for Relief was served on the Debtor, Debtors' Counsel, Counsel for the Unsecured Creditors Committee, the Office of the US Trustee, and all other parties receiving filings by the Court's ECF Notification System.

/s/ Robert Yaquinto, Jr.

Robert Yaquinto, Jr.